

JOEL A. ACKERMAN
JA 4027

FWA-97916-1/mca
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor
Wells Fargo Bank, NA
200 Sheffield Street, Suite 301
P.O. Box 1024
Mountainside, NJ 07092-0024
1-908-233-8500

IN RE:

Craig S. Puchalsky

: UNITED STATES BANKRUPTCY COURT
: FOR THE DISTRICT OF NEW JERSEY
:
: CHAPTER 7
:
Debtor : CASE NO. 10-32742-GMB
:
: **NOTICE OF MOTION TO VACATE**
: **AUTOMATIC STAY**
: **(RET: August 24, 2010 @ 10:00am)**
: **ORAL ARGUMENT WAIVED**

Craig S. Puchalsky
6 Lake Drive
Linwood, NJ 08221

Craig S. Puchalsky
608 8th Avenue
Galloway, NJ 08205

Leonard R. Wizmur, Esq.
Attorney for Debtor(s)
525 Route 73 South, Suite 200
Marlton, NJ 08053

Thomas J Subranni
Subranni, Ostrove & Zauber
1624 Pacific Avenue
Atlantic City, NJ 08401

SIRS:

PLEASE TAKE NOTICE that on August 24, 2010 @ 10:00am, or soon as counsel may be heard, the undersigned, attorneys for Wells Fargo Bank, NA, the Secured Creditor, will move before the United States Bankruptcy Court, 401 Market Street, 2nd Floor, 4C, P.O. Box 2067, Camden, NJ 08101 for an Order Vacating the Automatic Stay, with respect to the debtor's property at 6 Lake Drive, Linwood, NJ 08221, and allowing Wells Fargo Bank, NA, the secured creditor, to continue its foreclosure action, by reason of the Secured Creditor's interest in the premises located at 6 Lake Drive, Linwood, NJ 08221 being inadequately protected in violation of 11 USC 362(d)

TAKE FURTHER NOTICE that the facts Wells Fargo Bank, NA relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and

TAKE FURTHER NOTICE that oral argument is hereby not requested.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor
Wells Fargo Bank, NA
/s/ JOEL A. ACKERMAN
JOEL A. ACKERMAN
MEMBER OF THE FIRM

DATED: July 29, 2010

This is an attempt to collect a debt. Any information obtained will be used for that purpose.